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October 31, 1991

Peter Felitti, Esq.
Assistant Regional Counsel
U.S. Environmental Protection
Agency - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Great Lakes Asphalt

Dear Mr. Felitti:

We have received your correspondence dated September 4, 1991, and have reviewed it. As noted in our earlier correspondence, Conoco will consider a reasonable approach to finally resolving liability at the referenced site. Our interest, however, is qualified. We will expect the following items to be addressed before committing to a de minimis process.

1. A showing that this buyout will resolve all site liability, and that Region V is approaching this buyout in good faith. In other words, we don't want another "good deal" like Enviro-Chem.
2. If EPA persists in dealing with these sites separately, we expect that to be taken into account when a buyout charge is evaluated.
3. An answer to our FOI request (copy enclosed).
4. Appropriate language in the settlement, including no admission of liability. After all, our small contribution was covered under the petroleum exclusion.

Provided these factors are satisfactorily resolved, we will be glad to get this matter finally concluded.

Very truly yours,

Mark Withers

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